

1 ROBERT H. KING, JR.

2 PRISONER 6217368 - OREGON STATE

FILED 28 JUL '17 10:49 USDC-ORP

3 PRO SE Defendant

4 Snake River Correctional Institution (SRCI)

5 777 Stanton Blvd

6 Ontario, OR 97914

7 Pro Se Defendant

8

9

10 ROBERT WOODROFFE,  
11 Plaintiff,

12 V.

13 STATE OF OREGON, et AL.,  
14 Defendants.

15

16

17

18 I Robert H. King, Jr (Hereinafter Defendant  
19 King), hereby declare:

20

21

22

23

24

1. I am a Pro Se Defendant in this case.  
2. I am a Prisoner, Oregon State inmate (0000)  
number S10 6217368, currently incarcerated at  
The Snake River Correctional Institution (SRCI) in  
Ontario, Oregon.

3. I am an indigent prisoner proceeding IN FORMA

Page 1 of 5 Declaration of Defendant King in support of  
Motion to Extend time.

1 Pauperis in this Case (2:15-cv-02390-SB).

2 4. The current deadline I am assuming  
3 is sometime in August. Neither the Rule  
4 33 Interrogatories Nor the Requests for  
5 Admissions Rule 36 (Fed R. Civ. P.), neither  
6 Document had a proper date. No Day, listed,  
7 filed, No Month listed - filed (for the Record).

8 5. The Mail system at SRCI is currently  
9 Delayed and a letter from TRCI where the  
10 Plaintiff is located, takes up to 10 days  
11 to reach defendant King. This delays my access to the court.

12 6. The SRCI Prison law library has  
13 had delays with computer problems and  
14 I have to send a Request for everything  
15 including pleading paper, case law, Rules,  
16 Copy of FRCP etc inclusive of photocopies which  
17 takes up to 7 to 10 days to get a response.  
18 These delays cause defendant King Severe Response  
19 time problems.

20 7. Defendant King has No Physical  
21 Access to the Prison Law Library which  
22 causes further delays. I am not allowed to go to law library.

23 8. At Present Defendant King has been  
24 forced by the Oregon Department of Corrections

1 (0000) to Rely on convicted felons,  
2 who are untrained in the law, who  
3 are not lawyers who are not paralegals,  
4 who are not adequately trained in legal  
5 Research or legal computer searches,  
6 defendant King is forced to Rely on  
7 all of the above for any access to this  
8 Court, to wit.

9 9. Defendant King is ill, sick and  
10 has severe medical problems. Defendant King  
11 has Cancer. I have had three (3)  
12 cancer Related Surgeries Recently. I have  
13 had 35 Radiation treatments which has caused  
14 me further severe medical problems. I  
15 am now scheduled to have another cancer  
16 Related major surgery in late August or  
17 September. Because of Security Rules I  
18 am not allowed to know or be told  
19 when my next cancer Related Surgery will  
20 take place and when it does, I will  
21 be moved from SRCI in Ontario, Oregon, moved  
22 to CCK (Coffee Creek Correctional Facility) and  
23 have my Cancer Related Surgery in Portland  
24 Oregon. When [soon], I am transferred

1 to Portland, Oregon, I will not be  
2 allowed to take any of my legal  
3 files with me and could be gone  
4 out of SRCI for up to 120 days  
5 while I am Recovering from my hopefully  
6 last Cancer Related Surgery in a prison  
7 (CCCF) near Portland, Oregon. In Addition  
8 I will be too ill or sick after this  
9 upcoming cancer related surgery to do  
10 any legal work. I am still Recovering  
11 from my third surgery which I just  
12 had a few months ago and will soon,  
13 after this next upcoming surgery, be  
14 far too ill to do any legal work.

15 10. It took me two (2) days - good  
16 days, just to be able to prepare this  
17 declaration and motion for Extension of  
18 time. I am sick with cancer. I  
19 am on a Walker and have to use  
20 a wheelchair now to move around as a  
21 Result of the cancer and surgeries and  
22 Radiation treatments.

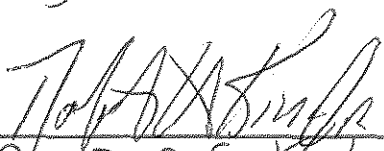
23 11. I Respectfully Request an extension  
24 of time to October 17, 2017, to Respond

1 to Plaintiffs' Fed R. Civ. P. Rule 36  
2 Requests For Admissions and Plaintiffs  
3 Fed R. Civ. P. Rule 33 Interrogatories which  
4 again for the Record are not properly  
5 dated per the Court Rules and Rules  
6 of the Federal Rules of Civil Procedure, to wit.

7 1a. This Request is made in good faith  
8 and not for the purposes of delay.

9 I declare under penalty of perjury that  
10 the foregoing is true and correct to the best  
11 of my knowledge and beliefs.  
12

13 Executed on July 18, 2017.

14  
15   
16 Pro Se Defendant  
17 Robert H. King, Jr.  
18 Prisoner 6217368  
19 Pro Se Defendant

20 ///

21 ///

22 ///

23 ///

24 ///

# Exhibit #1

Our Prison Law Library has  
been having multiple problems with  
staff, computers, institutional  
security problems that cause severe  
delays in processing any legal work,  
motions, pleadings etc to the court.  
This is one reason for the motion for  
continuance.

To Whom It May Concern

May 10, 2017

RE: Delayed Responses to Law Library Requests

SRCL Law Library recently updated all its computers and software, unfortunately during this process several problems beyond our control have occurred. This has prevented us from processing your Law Library request forms on a more efficient basis.

If you do have deadlines please attach verification of the deadline with your Law Library request form.

**THANK YOU** for your cooperation and patience, you have been gracious with the delays.

*Rochester*  
*Law Library Coordinator*  
SRCL LAW LIBRARY

Robert H. King, Jr 6217368 - Defendant Pro Se

Case 2:15-cv-02390-SB

Woodruffe v. Ellen Rosenblum, et al. / State of Oregon, et al.

Exhibit # 1  
Page 1 of 1